

212112



## Frontline Aviation, Inc. Air Charter Services

December 16, 2002

Federal Aviation Administration  
Office of Chief Counsel  
Attn: Rules Docket (AGC-200)  
800 Independence Ave. S.W.  
Washington, D.C. 20591

FAA-03-14251-1

Dear Sirs,

In accordance with 14 CFR 11.25, Frontline Aviation, Inc. (Certificate #VVFA-226U) hereby petitions the FAA for an exemption to 14 CFR 135.143 (c) (2). This part requires that after January 1, 1992, any transponder not meeting the requirements of TSO-C112 (mode S) may not be newly installed on any aircraft operating under the provisions of Part 135.

Although inventory shortfalls of Mode S transponder are not currently an issue, this petition is in the best interest of the public from both a safety and an economic perspective. An integral part of the Mode S rule is the ground sensor. Since the ground sensors are not available at this time the Mode S transponder is the same as a typical Mode A transponder. Additionally the FAA rescinded the Mode S requirement for Part 91 in 1992.

The exemption would generate benefits in the form of cost reduction to 135 operators and the public. The average price of a Mode S transponder is currently \$5,050 compared to \$1,679 for a Mode C transponder. The additional expense of being forced to install Mode S transponders would be passed on to the flying public.

Frontline Aviation, Inc. further requests this petition not be delayed by publication in the Federal Register. To delay this petition for publication would place significant economic hardship on our Part 135 operation.

In view of the fact that safety would not be impacted, but our economic aircraft operations will, Frontline Aviation, Inc. encourages you to expeditiously grant this petition for exemption. We have included a list of the aircraft that we wish to operate with any TSO C74b or C74c transponder. If you have any additional comments or questions concerning this petition you may contact me at (800) 379-3359.

Sincerely,

Rich Pollak

Director of Operations

AIRCRAFT:

Piper PA31	N5494R	PA31-7405410
Piper PA31	N4091F	PA31-8152155
Piper PA34	N252WA	PA34-8070211
BE 200	N432FA	BB592
BE 200	N200CJ	BB143